



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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MEMORANDUM

TO: The Commission

FROM: Kathleen M. Guith
Deputy Associate General Counsel for Enforcement

BY: Susan L. Lebeaux *SL*
Assistant General Counsel

Delbert K. Rigsby *DKR*
Attorney

SUBJECT: MUR 6759 (California Real Estate Political Action Committee/Federal -
California Association of Realtors) - Pre-Probable Cause Conciliation Agreement

On October 22, 2013, the Commission found reason to believe that the California Real Estate Political Action Committee/Federal - California Association of Realtors ("Committee") violated 2 U.S.C. § 434(b) by failing to disclose \$363,223.69 in receipts on its original 2011 Mid-Year Report, and authorized the Office of General Counsel to engage in pre-probable cause conciliation with the Committee. Attached is a negotiated conciliation agreement that has been signed by counsel for the Committee. Attach. 1. We recommend that the Commission accept this agreement and close the file in this matter.

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6 We believe this negotiated settlement represents an acceptable resolution of this matter.
7 We therefore recommend that the Commission accept the signed conciliation agreement with the
8 Committee and close the file.
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10 **RECOMMENDATIONS:**

- 11
12 1. Accept the attached conciliation agreement with California Real Estate Political
13 Action Committee/Federal - California Association of Realtors and M. Iqbal Bholat
14 in his official capacity as treasurer.
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16 2. Approve the appropriate letter.
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18 3. Close the file.
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